

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY'S MARKET PARENT COMPANY,  
LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10166 (JTD)

(Jointly Administered)

**AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
TELEPHONIC HEARING ON MARCH 30, 2020 AT 1:00 P.M. (ET)<sup>3</sup>**

**\*\*PLEASE NOTE THAT THE HEARING TIME  
HAS BEEN CHANGED BY THE COURT TO 1:00 P.M.\*\***

**RESOLVED/CONTINUED MATTERS**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 12; Filed: 1/27/2020]

Objection Deadline: February 19, 2020 at 4:00 p.m. (extended for certain parties)

Related Document(s):

- a) Interim Order Authorizing the Debtors to Use Cash Collateral of the Prepetition Secured Lender, (II) Granting Adequate Protection to the Prepetition Secured Lender, (III) Prescribing Form and Manner of Notice of and Scheduling Final Hearing, and (IV) Granting Related Relief [Docket No. 50; Entered: 1/28/2020]

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Lucky's Market Parent Company, LLC (2055), Lucky's Farmers Market Holding Company, LLC (5480), Lucky's Market Operating Company, LLC (7064), LFM Stores LLC (3114), Lucky's Farmers Market, LP (0828), Lucky's Farmers Market Resource Center, LLC (7711), Lucky's Market Holding Company 2, LLC (0607), Lucky's Market GP 2, LLC (9335), Lucky's Market 2, LP (8384), Lucky's Market of Longmont, LLC (9789), Lucky's Farmers Market of Billings, LLC (8088), Lucky's Farmers Markets of Columbus, LLC (3379), Lucky's Farmers Market of Rock Hill, LLC (3386), LFM Jackson, LLC (8300), Lucky's Farmers Market of Ann Arbor, LLC (4067), Lucky's Market of Gainesville, LLC (7877), Lucky's Market of Bloomington, LLC (3944), Lucky's Market of Plantation, LLC (4356), Lucky's Market of Savannah, GA, LLC (1097), Lucky's Market of Traverse, City, LLC (2033), Lucky's Market of Naples, FL, LLC (8700), Sinoc, Inc. (0723), Lucky's Farmers Market of Ellisville, LLC (2875), and Lucky's Farmers Market of Lexington, KY, LLC (3446).

<sup>2</sup> **Amended items appear bold.**

<sup>3</sup> This hearing will be held telephonically before the Honorable John T. Dorsey. Parties wishing to participate in the hearing must make arrangements through CourtCall (866-582-6878) in advance of the hearing.

- b) Second Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 507, Fed. R. Bankr. P. 2002, 4001 and 9014, and Del. Bankr. L.R. 4001-2 (I) Authorizing the Debtors to Use Cash Collateral of the Prepetition Secured Lender, (II) Granting Adequate Protection to the Prepetition Secured Lender, (III) Prescribing Form and Manner of Notice of and Scheduling Final Hearing, and (IV) Granting Related Relief [Docket No. 297; Entered: 2/27/2020]

Response(s) Received: Informal comments from several landlords, PACA Claimants and the Official Committee of Unsecured Creditors

Status: The final hearing on this matter has been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.

2. Motion of Debtors for Entry of an Order (I) Establishing Bar Dates for Filing Proofs of Claim, Including Section 503(b)(9) Claims and (II) Approving the Form and Manner of Notice Thereof [Docket No. 368; Filed: 3/9/2020]

Objection Deadline: March 23, 2020 at 4:00 p.m.

Related Document(s):

- a) Certificate of No Objection Regarding Motion of Debtors for Entry of an Order (I) Establishing Bar Dates for Filing Proofs of Claim, Including Section 503(b)(9) Claims and (II) Approving the Form and Manner of Notice Thereof [Docket No. 505; Filed: 3/25/2020]
- b) Order (I) Establishing Bar Dates for Filing Proofs of Claim, Including Section 503(b)(9) Claims and (II) Approving the Form and Manner of Notice Thereof [Docket No. 507; Entered: 3/25/2020]

Response(s) Received: None.

Status: An order has been entered. No hearing is necessary.

### **MATTERS GOING FORWARD**

3. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Publix Super Markets, Inc.) [Docket No. 63; Filed: 1/30/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 75; Filed: 1/31/2020]
- b) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- c) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- d) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V) Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (Publix Super Markets, Inc.) [Docket No. 282; Entered: 2/26/2020]
- e) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (Publix Super Markets, Inc.) [Docket No. 301; Filed: 2/28/2020]
- f) Notice of Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (Publix Super Markets, Inc.) [Docket No. 312; Filed: 2/28/2020]
- g) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- h) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- i) **Notice of Designation of Stalking Horse Purchaser as Successful Bidder [Docket No. 516; Filed: 3/27/2020]**
- j) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**

- k) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (Publix Super Markets, Inc.) [Docket No. 539; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Omnibus Limited Objection of Scott Randolph, Orange County, Florida Tax Collector to Debtors' Pending Motions for Sale of Property Free and Clear of Liens Under Section 363(f) to Respective Stalking Horse Bidders Publix Super Markets, Inc. [Dkt No. 63], Aldi, Inc. [Dkt No. 71], and Seabra Foods XIV, Inc. [Dkt No. 72] [Docket No. 413; Filed: 3/13/2020]
- b) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. to Debtors' Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]
- c) Limited Objection of Samson Merger Sub, LLC to the Debtors' Proposed Sale of Clermont Store and Proposed Assignment of Lease for Clermont Store to Publix Super Markets, Inc. [Docket No. 481; Filed: 3/23/2020]
- d) Limited Objection of U.S. Bank to Debtors' Pending Motions for Sale of Property Free and Clear of Liens Under Section 363(f) to Respective Stalking Horse Bidders and Other Qualified Bidders [Docket No. 490; Filed: 3/24/2020]
- e) Informal comments from the Office of the United States Trustee
- f) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

4. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (ALDI INC.) [Docket No. 71; Filed: 1/31/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 75; Filed: 1/31/2020]
- b) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- c) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- d) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V) Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (ALDI Inc.) [Docket No. 283; Entered: 2/26/2020]
- e) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (ALDI Inc.) [Docket No. 302; Filed: 2/28/2020]
- f) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (ALDI Inc.) [Docket No. 313; Filed: 2/28/2020]
- g) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- h) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- i) **Notice of Successful Bidder [Docket No. 522; Filed: 3/27/2020]**
- j) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- k) **Reply of Debtors to Supplemental Objection of ARC CLORLFL001 [Docket No. 535; Filed: 3/29/2020]**

- l) Motion for Leave to File and Serve a Late Reply in Response to Supplemental Objection of ARC CLORLFL001 [Docket No. 536; Filed: 3/29/2020]**
- m) Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**
- n) Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- o) Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (ALDI INC.) [Docket No. 540; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Omnibus Limited Objection of Scott Randolph, Orange County, Florida Tax Collector to Debtors' Pending Motions for Sale of Property Free and Clear of Liens Under Section 363(f) to Respective Stalking Horse Bidders Publix Super Markets, Inc. [Dkt No. 63], Aldi, Inc. [Dkt No. 71], and Seabra Foods XIV, Inc. [Dkt No. 72] [Docket No. 413; Filed: 3/13/2020]
- b) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- c) Objection and Reservation of Rights of Washington Prime Group Inc. to Debtors' Proposed Cure Amounts and Possible Assignment of Unexpired Leases [Docket No. 444; Filed: 3/18/2020]
- d) Limited Objection of ARC CLORLFL001, LLC, Brixmor Operating Partnership LP, Realty Income Properties 4, LLC, and TLF (ORLANDO), LLC, Series A to Sale Motions And Related Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts [Docket No. 448; Filed: 3/18/2020]
- e) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. to Debtors' Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]

- f) Limited Objection of Benderson Development Company, LLC to the Assumption and Assignment of Certain Unexpired Leases of Nonresidential Real Property [Docket No. 494; Filed: 3/24/2020]
- g) Supplemental Objection of ARC CLORLFL001 to ALDI Sale Motion and Notice of Potential Assumption and Assignment of Lease (Colonial Landing, Orlando, FL) [Docket No. 496; Filed: 3/24/2020]
- h) Informal comments from the Office of the United States Trustee
- i) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets.  
**All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

5. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Seabra Foods XIV, Inc.) [Docket No. 72; Filed: 1/31/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 75; Filed: 1/31/2020]
- b) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- c) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- d) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V)

Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (Seabra Foods XIV, Inc.) [Docket No. 285; Entered: 2/26/2020]

- e) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (Seabra Foods XIV, Inc.) [Docket No. 303; Filed: 2/28/2020]
- f) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (Seabra Foods XIV, Inc.) [Docket No. 314; Filed: 2/28/2020]
- g) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- h) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- i) **Notice of Designation of Stalking Horse Purchaser as Successful Bidder [Docket No. 517; Filed: 5/27/2020]**
- j) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- k) **Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**
- l) **Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- m) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (Seabra Foods XIV, Inc.) [Docket No. 541; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Omnibus Limited Objection of Scott Randolph, Orange County, Florida Tax Collector to Debtors' Pending Motions for Sale of Property Free and Clear of Liens Under Section 363(f) to Respective Stalking Horse Bidders Publix Super Markets, Inc. [Dkt No. 63], Aldi, Inc. [Dkt No. 71], and Seabra Foods XIV, Inc. [Dkt No. 72] [Docket No. 413; Filed: 3/13/2020]



- b) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- c) Limited Objection of ARC CLORLFL001, LLC, Brixmor Operating Partnership LP, Realty Income Properties 4, LLC, and TLF (ORLANDO), LLC, Series A to Sale Motions and Related Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts [Docket No. 448; Filed: 3/18/2020]
- d) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. to Debtors Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]
- e) Informal comments from the Office of the United States Trustee
- f) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

- 6. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 73; Filed: 1/31/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 75; Filed: 1/31/2020]

- b) Notice of Filing of Amended and Restated Exhibit A to Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 99; Filed: 2/4/2020]
- c) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- d) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- e) Notice of Filing of Second Amended and Restated Exhibit A to Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 280; Filed: 2/26/2020]
- f) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V) Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 287; Entered: 2/26/2020]
- g) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (LM Acquisition Co. LLC) [Docket No. 304; Filed: 2/28/2020]
- h) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to

the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (LM Acquisition Co. LLC) [Docket No. 315; Filed: 2/28/2020]

- i) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- j) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- k) **Notice of Successful Bidders [Docket No. 520; Filed: 3/27/2020]**
- l) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- m) **Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**
- n) **Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- o) **Notice of Filing of Revised Proposed Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 542; Filed: 3/29/2020]**
- p) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 546; Filed: 3/29/2020]**
- q) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 547; Filed: 3/29/2020]**
- r) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (LM Acquisition Co. LLC) [Docket No. 549; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- b) Objection to Notices to Counterparties to Potentially Assumed Executory Contract and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction Filed by Quadrant Wheat Ridge Corners, LLC and University Centre, LLC [Docket No. 451; Filed: 3/18/2020]
- c) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. to Debtors Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]
- d) Objection Filed by Albertson's LLC [Docket No. 472; Filed: 3/23/2020]
- e) Statement of Buffalo Ridge Center South, LLC Regarding Notices to Counter-Parties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 479; Filed: 3/23/2020]
- f) Informal comments from the Office of the United States Trustee
- g) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

7. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Winn-Dixie Store, Inc.) [Docket No. 97; Filed: 2/4/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- b) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- c) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V) Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (Winn-Dixie Stores, Inc.) [Docket No. 284; Filed: 2/26/2020]
- d) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (Winn-Dixie Stores, Inc.) [Docket No. 305; Filed: 2/28/2020]
- e) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (Winn-Dixie Stores, Inc.) [Docket No. 316; Filed: 2/28/2020]
- f) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- g) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- h) Notice of Successful Bidder [Docket No. 519; Filed: 3/27/2020]**
- i) Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- j) Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**

- k) **Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- l) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (Winn-Dixie Stores, Inc.) [Docket No. 543; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Objection of Snyder Construction, Inc., d/b/a Snyder General Construction, Inc. to Cure Amounts Set Forth in the (i) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [D.I. 316], (ii) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [D.I. 318], and (iii) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [D.I. 401] [Docket No. 431; Filed: 3/17/2020]
- b) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- c) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. to Debtors Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]
- d) Objection of Snyder Construction, Inc., d/b/a Snyder General Construction, Inc. to (i) Motion for (A) Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Winn-Dixies Stores, Inc.) [D.I. 97] and (ii) Motion for an Order (A) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and C) Granting Related Relief [Docket No. 473; Filed: 3/23/2020]

- e) Objection of Benderson Properties, Inc. and WR-I Associates, LTD. to Debtors' Proposed Assignment of the Gateway Shoppes Lease to Winn-Dixie Stores, Inc. [Docket No. 497; Filed: 3/24/2020]
- f) Limited Objection of DDRTC Cypress Trace LLC to the Assumption and Assignment of a Certain Unexpired Lease of Nonresidential Real Property [Docket No. 498; Filed: 3/24/2020]
- g) Informal comments from the Office of the United States Trustee
- h) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**
- i) **Precautionary Objection of Stalking Horse Purchaser, Winn-Dixie Stores, Inc. to Benderson Bid for Store Located at 1355-85 Tamiarmi Trail North, Naples, Florida (Gateway Shoppes) [Docket No. 530; Filed: 3/29/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **The sale hearing with respect to Bonita Springs *only* has been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m. as set forth on the record at the auction. All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

8. Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Carlos Alvarez) [Docket No. 98; Filed: 2/4/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 101; Filed: 2/4/2020]
- b) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]

- c) Order (I) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing the Debtors to Enter Into the Stalking Horse Agreement, (V) Approving Bid Protections, (VI) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (VII) Granting Related Relief (Carlos Alvarez) [Docket No. 286; Entered: 2/26/2020]
- d) Notice of Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors (Carlos Alvarez) [Docket No. 306; Filed: 2/28/2020]
- e) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction (Carlos Alvarez) [Docket No. 317; Filed: 2/28/2020]
- f) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- g) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- h) Objection of Seritage SRC Finance LLC to Sale Motion and Potential Assumption and Assignment of Lease [Docket No. 499; Filed: 3/24/2020]
- i) **Notice of Designation of Stalking Horse Purchaser as Successful Bidder [Docket No. 518; Filed: 3/27/2020]**
- j) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- k) **Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**
- l) **Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- m) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of Certain of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief (Carlos Alvarez) [Docket No. 544; Filed: 3/29/2020]**



Sale/Cure Objection(s) Received:

- a) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- b) Objection of Seritage SRC Finance LLC to Notice to Counterparties to Potentially Assumed Executory Contract and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 450; Filed: 3/18/2020]
- c) Objection of Seritage SRC Finance LLC to Sale Motion and Potential Assumption and Assignment of Lease [Docket No. 499; Filed: 3/24/2020]
- d) Informal comments from the Office of the United States Trustee
- e) **Supplemental Objection of Seritage SRC Finance LLC to Sale Motion and Potential Assumption and Assignment of Lease [Docket No. 524; Filed: 3/27/2020]**
- f) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

9. Motion of Debtors for Entry of (I) an Order (A) Approving Global Bid Procedures in Connection with the Sale of the Remainder of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (E) Granting Related Relief; and (II) an Order (A) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief [Docket No. 186; Filed: 2/13/2020]

Cure Objection Deadline: March 18, 2020 at 4:00 p.m.  
March 23, 2020 at 4:00 p.m. (Supplemental Notice)

Sale Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s):

- a) Second Amended Declaration of Scott Moses in Support of the Debtors' Bidding Procedures Motions [Docket No. 188; Filed: 2/13/2020]
- b) Order (I) Approving Global Bid Procedures in Connection with the Sale of the Remainder of the Debtors' Assets, (II) Scheduling an Auction and Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [Docket No. 288; Entered: 2/26/2020]
- c) Notice of Global Bid Procedures, Auction, Hearing and Deadline Relating to the Sale of Certain of the Assets of the Debtors [Docket No. 311; Filed: 2/28/2020]
- d) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 318; Filed: 2/28/2020]
- e) Certificate of Publication re: Notice of Bid Procedures [Docket No. 372; Filed: 3/9/2020]
- f) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 401; Filed: 3/11/2020]
- g) **Notice of Successful Bidder [Docket No. 521; Filed: 3/27/2020]**
- h) **Declaration of Scott Moses in Support of the Debtors' Sale Motions [Docket No. 534; Filed: 3/29/2020]**
- i) **Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 537; Filed: 3/29/2020]**
- j) **Motion for Leave to File and Serve a Late Omnibus Reply of Debtors to Cure, Assignment, and Sale Objections Related to Debtors' Sale Motions [Docket No. 538; Filed: 3/29/2020]**
- k) **Notice of Filing of Revised Proposed Order (I) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief [Docket No. 545; Filed: 3/29/2020]**

- I) Notice of Filing of Revised Proposed Order (I) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Authorizing the Assumption and Assignment of Contracts and Leases, and (III) Granting Related Relief [Docket No. 548; Filed: 3/29/2020]**

Sale/Cure Objection(s) Received:

- a) Objection of Market at McKnight I, LLC to (A) Motion of Debtors for Entry of (I) an Order (A) Approving Global Bid Procedures in Connection with the Sale of the Remainder of the Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (E) Granting Related Relief; and (II) an Order (A) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief; (B) Notice of Global Bid Procedures, Auction, Hearing and Deadlines Relating to the Sale of Certain of the Assets of the Debtors; and (C) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 387; Filed: 3/10/2020]
- b) Objection of Snyder Construction, Inc., d/b/a Snyder General Construction, Inc. to Cure Amounts Set Forth in the (i) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [D.I. 316], (ii) Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [D.I. 318], and (iii) Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [D.I. 401] [Docket No. 431; Filed: 3/17/2020]
- c) Objection of Tamiami Investment Partners, LLC to Executory Contract Cure Amounts [Docket No. 432; Filed: 3/17/2020]
- d) Objection of Landlord Woolbright Wekiva, LLC to Cure Amount in Notice To Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 437; Filed: 3/18/2020]

- e) Limited Objection of U.S. Bank to Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 438; Filed: 3/18/2020]
- f) Ufer Family Properties LLC's Objection to the Cure Amount Set Forth in the Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 440; Filed: 3/18/2020]
- g) Amended Objection of Tamiami Investment Partners, LLC to Executory Contract Cure Amounts [Docket No. 441; Filed: 3/18/2020]
- h) Objection and Reservation of Rights of Washington Prime Group Inc. to Debtors' Proposed Cure Amounts and Possible Assignment of Unexpired Leases [Docket No. 444; Filed: 3/18/2020]
- i) Objection of Dania Live 1748, LLC to Potentially Assumed Executory Contracts and Unexpired Lease Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 445; Filed: 3/18/2020]
- j) Limited Objection of ARC CLORLFL001, LLC, Brixmor Operating Partnership LP, Realty Income Properties 4, LLC, and TLF (ORLANDO), LLC, Series A to Sale Motions and Related Notices to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts [Docket No. 448; Filed: 3/18/2020]
- k) Gulf to Bay LM, LLC's Objection to Notice of Sale and Proposed Cure Amount [Docket No. 449; Filed: 3/18/2020]
- l) Objection to Notices to Counterparties to Potentially Assumed Executory Contract and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Stalking Horse Purchaser or Such Other Successful Bidder at Auction Filed by Quadrant Wheat Ridge Corners, LLC and University Centre, LLC [Docket No. 451; Filed: 3/18/2020]
- m) Objection of Glades 95th Owner LLC to Potentially Assumed Executory Contracts and Unexpired Lease Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [Docket No. 452; Filed: 3/18/2020]
- n) Objection of Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers Corp., and TLM Realty Corp. To Debtors Proposed Cure Amounts for Certain Unexpired Leases of Nonresidential Real Property [Docket No. 453; Filed: 3/18/2020]

- o) Objection to the Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction Filed by SB-Vets-1, LLC [Docket No. 457; Filed: 3/19/2020]
- p) Objection of Snyder Construction, Inc., d/b/a Snyder General Construction, Inc. to (i) Motion for (A) Sale of Certain of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief (Winn-Dixies Stores, Inc.) [D.I. 97] and (ii) Motion for an Order (A) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and C) Granting Related Relief [Docket No. 473; Filed: 3/23/2020]
- q) Ufer Family Properties LLC's Objection to the Assumption and Assignment of Its Lease Without Applicable Restrictive Covenants as Set Forth in the Supplemental Notice to Counterparties to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to a Stalking Horse Purchaser or Such Other Successful Bidder at Auction [Docket No. 474; Filed: 3/23/2020]
- r) Objection of Kimco-Peters Co. Ltd to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts, Use Limitations and Possible Assignment to the Successful Bidder at Auction [Docket No. 476; Filed: 3/23/2020]
- s) Objection of Teachers' Retirement System of the State of Kentucky to Amount of Cure Claim [Docket No. 477; Filed: 3/23/2020]
- t) Objection of Dania Live 1748, LLC to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Issues Related to Use Restrictions and Global Bid Procedures [Docket No. 478; Filed: 3/23/2020]
- u) Objection of Glades 95th Owner, LLC to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Issues Related to Use Restrictions and Global Bid Procedures [Docket No. 480; Filed: 3/23/2020]
- v) Captive-Aire System, Inc.'s Limited Objection to Debtor's Motion for Entry of (I) an Order (A) Approving Global Bid Procedures in Connection With the Sale of the Remainder of Debtors' Assets, (B) Scheduling an Auction and Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Procedures for the Assumption and Assignment of Contracts and Lease, and (E) Granting Related Relief; and (II) an Order

(A) Approving the Sale of the Remainder of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts and Leases, and (C) Granting Related Relief [Docket No. 489; Filed: 3/23/2020]

- w) Objection of Gulf to Bay L.M., LLC to Relief Requested at the Sale Hearing [Docket No. 495; Filed: 3/24/2020]
- x) Second Amended Objection of Tamiami Investment Partners, LLC to Executory Contract Cure Amounts [Docket No. 510; Filed: 3/25/2020]
- y) **Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Sale of Certain Assets [Docket No. 527; Filed: 3/28/2020]**
- z) **Joinder of Dania Live 1748, LLC to Official Committee of Unsecured Creditors Objection to the Debtors' Sale of Certain Assets and Supplements to Dania Live 1748, LLC Objection to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction and Objection of Dania Live 1748, LLC to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Issues Related to Use Restrictions and Global Bid Procedures [Docket No. 531; Filed: 3/29/2020]**
- aa) **Joinder of Glades 95th Owner LLC to Official Committee of Unsecured Creditors Objection to Debtors' Sale of Certain Assets and Supplements to Glades 95th Owner LLC Objection to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction and Objection of Glades 95th Owner LLC to Potentially Assumed Executory Contracts and Unexpired Leases Regarding Issues Related to Use Restrictions and Global Bid Procedures [Docket No. 532; Filed: 3/29/2020]**

Status: This matter will go forward with respect to the sale of the Debtors' assets. **All objections to cure and adequate assurance have been continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

10. Application of Debtors for an Order (I) Authorizing the Employment and Retention of CBRE, Inc. as Real Estate Advisor to the Debtors, *Nunc Pro Tunc* to the Petition Date, (II) Waiving Certain Information Requirements of Local Rule 2016-2, and (III) Granting Related Relief [Docket No. 294; Filed: 2/27/2020]

Objection Deadline: March 12, 2020 at 4:00 p.m. (extended for certain parties)

Related Document(s): None.

Response(s) Received: Informal comments from the Office of the United States Trustee and the Official Committee of Unsecured Creditors

Status: **This matter is continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

11. Motion of New Lexington Clinic P.S.C. for Entry of an Order (I) Compelling the Debtors to Reject Any Interest In a Certain Non-Residential Real Property Sublease, (II) Requiring the Debtors to Cause Non-Debtor Luckys Market of Lexington, KY, LLC to Terminate Interest In Sublease, and (III) Granting Related Relief [Docket No. 308; Filed: 2/28/2020]

Objection Deadline: March 6, 2020 at 4:00 p.m. (The Debtors were granted an extension to respond until March 9, 2020)

Related Document(s): None.

Response(s) Received:

- a) Objection of Debtors to Motion of New Lexington Clinic P.S.C. for Entry of an Order (I) Compelling the Debtors to Reject Any Interest In a Certain Non-Residential Real Property Sublease; (II) Requiring the Debtors to Cause Non-Debtor Luckys Market of Lexington, KY, LLC to Terminate Interest In Sublease, and (III) Granting Related Relief [Docket No. 371; Filed: 3/9/2020]

Status: **This matter is continued to the next omnibus hearing scheduled for April 14, 2020 at 10:00 a.m.**

12. Second Omnibus Motion of Debtors Seeking Entry of an Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and Contracts and (B) Abandonment of Certain Personal Property, if Any, Each Effective *Nunc Pro Tunc* to February 29, 2020 and (II) Granting Related Relief [Docket No. 310; Filed: 2/28/2020]

Objection Deadline: March 6, 2020 at 4:00 p.m.

Related Document(s):

- a) Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and Contracts and (B) Abandonment of Certain Personal Property, if Any, Each Effective *Nunc Pro Tunc* to February 29, 2020 and (II) Granting Related Relief [Docket No. 406; Entered: 3/12/2020]

Response(s) Received:

- a) Horn Investment Company's Objection to Debtors' Second Omnibus Motion of Debtors Seeking Entry of an Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and Contracts and (B)

Abandonment of Certain Personal Property, if Any, Each Effective *Nunc Pro Tunc* to February 29, 2020 and (II) Granting Related Relief [Docket No. 492; Filed: 3/24/2020]

Status: This matter will go forward solely with respect to the leases related to stores in Jackson, WY. An order has been entered with respect to all other leases and contracts.

13. Motion of Scott Randolph, Orange County, Florida Tax Collector, for Adequate Protection In Respect of Secured Claims and Liens for 2020 Tangible Personal Property Taxes [Docket No. 414; Filed: 3/13/2020]

Objection Deadline: March 24, 2020 at 4:00 p.m.

Related Document(s): None.

Response(s) Received:

- a) Objection of Debtors to Motion of Scott Randolph, Orange County, Florida Tax Collector, for Adequate Protection In Respect of Secured Claims and Liens for 2020 Tangible Personal Property Taxes [Docket No. 493; Filed: 3/24/2020]

Status: This matter will go forward.

Dated: March **30**, 2020  
Wilmington, Delaware

Respectfully submitted,

**POLSINELLI PC**

/s/ Christopher A. Ward  
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